

Courts in this circuit have regularly agreed to seal documents containing commercial sensitive confidential information including payment terms. See *Moore v. Westgate Resorts, Ltd.*, 2020 WL 7017738, at *1-3 (E.D. Tenn. May 22, 2020).

Therefore, pursuant to Local Rule 26.2, Plaintiffs seek to submit the highlighted portions of the documents referenced above under seal. Pursuant to Fed. R. Civ. P. 5.2(f), Plaintiffs also seek leave of Court to submit an unredacted copy of each document.

Respectfully submitted this 8th day of September, 2021.

/s/ John L. Wood

John L. Wood, Esq. (BPR #027642)
Cheryl G. Rice, Esq. (BPR #021145)
Rameen J. Nasrollahi, Esq. (BPR #033458)
EGERTON, McAFEE, ARMISTEAD

& DAVIS, P.C.
900 S. Gay Street, Suite 1400
P.O. Box 2047
Knoxville, TN 37902
(865) 546-0500 (phone)
(865) 525-5293 (facsimile)
jwood@emlaw.com
crice@emlaw.com
rnasrollahi@emlaw.com

Morgan Chu (CA Bar. No. 70446)
David Nimmer (CA Bar. No. 97170)
A. Matthew Ashley (CA Bar. No. 198235)
Olivia L. Weber (CA Bar. No. 319918)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010 (phone)
(310) 203-7199 (facsimile)
mchu@irell.com
dnimmer@irell.com
mashley@irell.com
oweber@irell.com
Attorneys for Plaintiffs
SNMP RESEARCH INTERNATIONAL, INC. and
SNMP RESEARCH, INC.